



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 25, 2018

BY ECF AND HAND

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cohen v. United States*, 18 Mag. 3161 (KMW)

Dear Judge Wood:

By Order dated June 22, 2018, the Court ordered the Plaintiff and Intervenors to complete their designation of potentially privileged material by June 27, 2018. By Affirmation dated June 23, 2018, Intervenor Trump Organization asks for an additional two weeks to complete this process. The Government respectfully submits this letter to oppose Intervenor's request.

The Affirmation makes no mention of the resources the Intervenor has dedicated to this process or why, in light of the small fraction of material provided by Plaintiff for the Intervenors' review—much less found to be privileged by the Special Master to date—such additional time is required. The Government has already consented to an adjournment of the Plaintiff's time to make designations, and it has been nearly three months since execution of the search warrants. Further delay will unreasonably impede the Government's investigation.

That said, if the Court is inclined to grant any adjournment, the Government respectfully submits that it should be no more than one week, or until July 5, 2018, for the designation

Respectfully submitted,

By: /s/
 Rachel Maimin
 Andrea Griswold
 Thomas McKay
 Nicolas Roos
 Assistant United States Attorneys
 (212) 637-2460

cc: Alan Futerfas, Esq. (by ECF)
Todd Harrison, Esq. (by ECF)
Joanna Hendon, Esq. (by ECF)